

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIZABETH BURBAGE,	x	:	
		:	
Plaintiff,		:	Case No. CV 07 37665
		:	and Twenty-Seven
- against -		:	Related Actions
		:	(WCC)(GAY)
LOUIS PUBLIC COMPANY LIMITED and GROUP VOYAGERS, INC.,	:	:	<u>AFFIDAVIT</u>
Defendants.		:	
NORMA BALDUCCI,	x	:	
		:	
Plaintiff,		:	Case No. 07 Civ. 3668 (WCC)
		:	
-against-		:	
LOUIS PUBLIC COMPANY LIMITED and GROUP VOYAGERS, INC.,	:	:	
		:	
Defendants.		:	
LORRAINE CARPINO,	x	:	
		:	
Plaintiff,		:	Case No. 07 Civ. 6977 (WCC)
		:	
-against-		:	
LOUIS PUBLIC COMPANY LIMITED and GROUP VOYAGERS, INC.,	:	:	
		:	
Defendants.		:	
PATRICIA DeASTIS	x	:	
		:	
Plaintiff,		:	Case No. 07 Civ. 3681 (WCC)
		:	
-against-		:	
LOUIS PUBLIC COMPANY LIMITED and GROUP VOYAGERS, INC.,	:	:	
		:	
Defendants.		:	

-----x
ANN HORRIGAN, :
:
Plaintiff, : Case No. Civ. 3677 (WCC)
:
-against- :
:
LOUIS PUBLIC COMPANY LIMITED and GROUP :
VOYAGERS, INC., :
:
Defendants. :
-----x
LAURA KOSSOW, :
:
Plaintiff, : Case No. Civ. 4638 (WCC)
:
-against- :
:
LOUIS PUBLIC COMPANY LIMITED and GROUP :
VOYAGERS, INC., :
:
Defendants. :
-----x
LUCY VITALIANO, :
:
Plaintiff, : Case No. Civ. 6979 (WCC)
:
-against- :
:
LOUIS PUBLIC COMPANY LIMITED and GROUP :
VOYAGERS, INC., :
:
Defendants. :
-----x

PAUL S. EDELMAN, being duly sworn, deposes and says:

I am counsel to the firm of Kreindler & Kreindler LLP and am fully acquainted with the facts and circumstances of this case. My firm has substituted for the firm of Todd J. Krouner and has filed Consents to Change Attorneys in the cases of Norma Balducci, Lorraine Carpino,

Patricia DeAstis, Ann Horrigan, Laurel Kossow and Lucy Vitaliano. We are awaiting signed consents from Lauren, Sarah and W. Henry Alderfer, but they are abroad and receipt of signed consents has been delayed. We now also represent 22 other clients of Mr. Krouner's, 17 of our own and 24 from Calgary, Canada. Of Mr. Krouner's cases only these 31 remain; the others have been settled.

Attached to this affidavit are the following relevant documents which will be referred to in the accompanying Memorandum of Law.

1. The ticket of Defendant Louis Cruises received from Defendant Group Voyagers.
2. EC Law, 90/314/EEC (EC Package Travel Regulations).
3. The (so-called) Garrido cases decided under the above regulations;

“Club Tour v. Garrido”, (Porto, Portugal) which explains the reach of the directive, and discusses strict liability against a tour operator/organizer.

4. EU Summary of Council Directive 90/314/EEC on package travel.
5. Affirmation of Alexander Anolik concerning the EC Directive.

Dated: February 26, 2008



Paul S. Edelman

Sworn to before me this
26 day of February 2008



EUGENIE L. MASTERSON
Notary Public

EUGENIE L. MASTERSON
Notary Public, State of New York
No. 30-4719641
Qualified in Nassau County
Term Expires October 31, 2010